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December 13, 2024

The Honorable Christopher M. Lopez  
United States Bankruptcy Court  
515 Rusk Street, Courtroom 401  
Houston, TX 77002

***Re: In re: Red River Talc LLC – Case No. 24-90505 (CML)***

Dear Judge Lopez:

Pursuant to the Court's directive during the December 10, 2024 status conference, I write to provide the following update concerning Beasley Allen's compliance with the Court's November 26<sup>th</sup> discovery rulings:

- 1. Sample fee agreements:** Beasley Allen produced representative fee agreements, dated 2014 and 2019, on December 6, 2024, without redaction in accordance with the Court's order of November 26, 2024 (Dkt. 679) (BA00001035-BA00001036; BA0000114-A00001143; BA00001160-BA00001161; BA00001162- A00001163).
- 2. Form Correspondence to Clients:** Beasley Allen produced its written communications to all clients concerning the prepackaged bankruptcy plan (letters, emails and texts), dated April 18, 2024; May 13, 2024; May 17, 2024; June 5, 2024; June 21, 2024; July 12, 2024; and July 24, 2024. The documents were redacted in accordance with Beasley Allen's understanding of the Court's directions on November 26, 2024. *See Tr. at p. 23, 28-29.* The Bates range for these documents is: BA00001008-BA00001028. Examples of these documents are attached as Exhibit A.
- 3. Cases in which representation is in dispute:** The Debtor has raised questions regarding Beasley Allen's representation of 21 clients purportedly also represented by Onder Law. On December 6, 2024, Beasley Allen produced its unredacted fee agreements for each of the 21 claimants in question (BA00001029-BA00001163). *See 11-26-24 Tr. at p. 21, ll. 10-17, p. 24, ll. 1-4.* On December 11, 2024, Beasley Allen produced correspondence to these 21 clients concerning the prepackaged bankruptcy plan with appropriate redactions (BA00001164-BA00001475). Examples of these documents are attached as Exhibit B.
- 4. List of Who Voted “Yes” or “No”:** Beasley Allen produced a list of its clients whose votes Beasley Allen recorded prior to submitting the Master Ballot as “no” and a list of clients whose votes Beasley Allen recorded prior to submitting the Master Ballot as “yes” on December 6, 2024. *See 11-26-24 Tr. at p. 22.* (BA00001077-BA00001139, BA00001140-BA00001141).

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5. **Client Communications Regarding Vote:** The Court ordered Beasley Allen to produce redacted responses to the voting solicitation from clients “saying I vote yes, I vote no.” *See* 11-26-24 Tr. at p. 21-22; 30; 38; and 39. On December 6, 2024, Beasley Allen produced such communications from 517 clients in which the clients provided direction on how he or she wished to vote. These communications were originally produced under the designation “Professional Eyes Only,” and will be re-produced under the designation “Confidential.” The portion of the communications reflecting the clients’ directions are not redacted. Additional documents will be produced by close of business on December 13, 2024. Productions will continue on a rolling basis until complete. These documents include emails, texts, phone logs, and letters. Examples of such documents are attached as Exhibit C.
6. **Clients Who Have Died During the Litigation:** To date, approximately 2,210 Beasley Allen talc clients unfortunately have passed away during the pendency of these litigations and bankruptcies. The Court ordered Beasley Allen to produce a list of such deceased clients and the names of her next of kin or personal representative with whom Beasley Allen communicates regarding the claims originally asserted by the decedents. *See* 11-26-24 Tr. at p. 33. On December 13, 2024, Beasley Allen produced a list of Beasley Allen talc clients who have passed away and the names of the decedent’s personal representative or next of kin. (BA00001476-BA00001518). Beasley Allen expects to begin producing copies of fee agreements with these personal representatives and next of kin next week.
7. **Imerys Talc America, Inc. Bankruptcy:** On November 15, 2024, Beasley Allen produced the 2021 Master Ballot submitted on behalf of its clients in the Imerys bankruptcy. (BA00000828-00001007). We understand that the Debtor is seeking a basis for comparing the Imerys Master Ballot and the Red River Master Ballot. Beasley Allen does not possess any document that would enable the Debtor to do that other than the face of the two ballots.

Beasley Allen is continuing its efforts to abide by the Court’s directives during the November 26, 2024 hearing. We are confident that, when a complete and accurate record is placed before the Court, it will find that Beasley Allen’s compliance with its responsibilities both before and after this prepackaged bankruptcy filing stands in stark contrast to that of the Smith Law Firm and to that of firms on the Ad Hoc Committee of Supporting Counsel who signed Plan Support Agreements with J&J.

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Thank you for the Court's ongoing consideration of this matter.

Respectfully submitted,

BEASLEY, ALLEN, CROW, METHVIN,  
PORTIS & MILES, P.C.

*/s/ P. Leigh O'Dell*

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